

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VELARDO RIVERA and
YASMINE ROMERO, individually,
and on behalf of all others similarly situated,

V.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:22-CV-00269-JHC

STIPULATED MOTION AND ORDER
TO MODIFY DEADLINE

Defendant Amazon Web Services, Inc. (“AWS”) and Plaintiffs Avelardo Rivera and Yasmine Romero (collectively, the “Parties”) stipulate and jointly move to extend the Parties’ deadline to submit a joint status report proposing case deadlines through class certification.

In support of that motion, the Parties state as follows:

1. On December 19, 2023, the Court granted the Parties' stipulated motion to extend certain deadlines and ordered the Parties to submit a "joint status report and proposed deadlines through class certification" within 30 days after the Court's ruling on AWS's then-pending Motion for Clarification. Dkt. # 134 at 3.

2. The Court granted AWS's Motion for Clarification on January 31, 2024. *See* Dkt. # 152 at 1-2. In its order granting AWS's Motion for Clarification, the Court extended the fact discovery period by an additional 90 days, or until April 30, 2024. *See id.* at 2.

1 3. Because the Court resolved AWS's Motion for Clarification on January 31, 2024,
2 the Parties' deadline to submit a joint status report and proposed deadlines through class
3 certification is March 1, 2024. *See* Dkt. # 134 at 3.

4 4. The Parties agree that discovery conducted between now and the April 30, 2024
5 extended fact discovery deadline may significantly impact the case schedule. As a result, if the
6 Parties propose a case schedule now, then it is very likely that one or both Parties would later
7 seek to revise the case schedule.

8 5. Accordingly, for the sake of efficiency, the Parties respectfully request that the
9 Court extend the Parties' deadline to submit a joint status report and proposed deadlines through
10 class certification from March 1, 2024 to April 23, 2024, which is one week before the extended
11 fact discovery deadline of April 30, 2024.

12 6. As such, good cause exists for the requested extension.

13 WHEREFORE, the Parties respectfully request that the Court extend the Parties'
14 deadline to submit a joint status report and proposed deadlines through class certification from
15 March 1, 2024 to April 23, 2024.

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17 Dated: March 1, 2024

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LCR 7(e) Certification

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2 I certify that this memorandum contains 325 words, in compliance with the Local Civil
3 Rules.

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/s/ Ryan Spear

ORDER

IT IS SO ORDERED.

DATED this 1st day of March, 2024.

John H. Chun
JOHN H. CHUN
UNITED STATES DISTRICT JUDGE